

SHER TREMONTE LLP

July 26, 2022

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BY ECF

The Honorable Kimba M. Wood  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Luis Espinal*, 19-CR-821 (KMW)

Dear Judge Wood:

**MEMO ENDORSED**

We write on behalf of our client, Luis Espinal to respectfully request a modification of Mr. Espinal's bond to remove the location monitoring condition. The government and Pretrial Services consent to this request.

Mr. Espinal was arrested on November 20, 2019. On November 26, 2019, Mr. Espinal was released on a personal recognizance bond in the amount of \$100,000 to home detention to the apartment where he lives with his parents and brother. Since his release, Mr. Espinal has participated in various treatment programs, including individual therapy sessions and group classes for anger management and drug dependency. As of this month, Mr. Espinal has completed his group class program. Mr. Espinal has also consistently participated in random drug testing and mental health treatment, as well as complied with his prescribed medication regimen. In addition, Mr. Espinal has successfully completed his GED courses and received his GED diploma. Mr. Espinal was recently accepted to the Borough of Manhattan Community College (BMCC) for the Fall semester starting August 25, 2022.

In sum, Mr. Espinal has not only been in substantial compliance with his conditions of release, he has used his time productively and has proven his trustworthiness to Pretrial Services. In light of the foregoing, the undersigned was contacted by U.S. Pretrial Services Officer Jonathan Lettieri, who inquired whether we would make an application to remove the location monitoring condition from Mr. Espinal's bond and indicated that Pretrial consented to such a modification. We have spoken with AUSA Jim Ligtenberg, and the government also consents.

Accordingly, we respectfully request that the Court modify Mr. Espinal's bond to remove the requirement of location monitoring.

] Granted.  
KMW

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We appreciate Your Honor's consideration.

Respectfully submitted,

/s/  
Justine A. Harris  
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*Attorneys for Luis Espinal*

cc: AUSA Jim Ligtenberg (by ECF)

SO ORDERED, N.Y., N.Y.

7/28/22

*Kimba M. Wood*

**KIMBA M. WOOD**

**U.S.D.J.**